

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FRAIN SIMPLIS;

CASE NO.:17CV-00183JRH-GRS

LASHONDRA SIMPLIS

Plaintiffs,

vs.

JP MORGAN CHASE BANK;

TRANSLAND FINANCIAL SERVICES;

WASHINGTON MUTUAL BANK;

And ALL Persons claiming any interest in real

Property located at 864 Southbridge Blvd.;

Savannah, Georgia 31405 aka lot 907;

and Does 1-20,

Defendants

**U. S. DISTRICT COURT
Southern District of Ga.
Filed in Office**

4/15/17

Deputy Clerk

OPPOSITION TO MOTION FOR DISMISS

We, Frain and LaShondra Simplis pro se litigants, are filing this opposition to the motion to dismiss filed by the Defendant JP Morgan Chase. This matter is a genuine issue of material fact as it relates to the defendants and their predecessors intent to illegally foreclose on a property for which they have no rights.

This opposition is based on the fact that neither of the predecessors for this property held legal business licenses in the state of Georgia and in times recent to the date of the loan were considered being revoked in the original state of its operations. These facts are true and binding having submitted previous documents to the court supporting these material facts.

Pleas allow for the development of additional facts in this case and please do not dismiss the case based on the unfounded merits of the defendants. We respectfully submit this opposition to the court as pre, se litigants.

Frain Simplis

LaShondra Simplis

Frain and LaShondra Simplis

864 Southbridge Boulevard

Savannah, GA 31405

Kutock Rock, LLP

Atlanta, GA

Submitted via US Mail to Defendants